

July 28, 1994

Mr. James H. Quello, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Dear Mr. Quello:

Re: FCC CC Docket No. 92-77, June 6, 1994
Billed Party Preference - Inmate Facility Collect Calls

In opposition to the referenced FCC order, Oakland County submits the following comments for your consideration:

1. In May 1993, Oakland County submitted requests for proposals nationwide to 62 prospective providers of inmate telephone service and received 18 proposals on June 16, 1993. This request for proposals replaced 151 inmate phones previously provided by Ameritech. Specific objectives of the RFP were:
 - to create a competitive environment among intra and interlata providers of service in the marketplace. (See attached RFP cover page and proposal form.)
 - to offer rates to the public that did not exceed rates charged by the prevailing dominant regulated intra and interlata providers of service. (See Section D, page 17, of RFP attached.)

It is Oakland County's contention that "BBP" is not required as it has already taken the necessary initiatives to ensure inmate families pay a "fair market rate" for collect calls and that it is the County's continued responsibility to monitor rate compliance. Oakland County supports any action by the FCC to impose rate ceilings to eliminate vendor "price gouging."

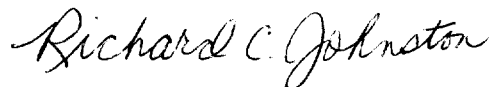
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2. Oakland County vehemently opposes loss of call control over inmate call routing, call tracking, and the ability to control fraudulent calls. The call-blocking feature can eliminate repetitive harassment-type calls. Call tracking can assist in identifying "scam" patterns. New software developments will allow a voice overlay to be played repetitively every 90 seconds identifying calls as coming from an "Oakland County inmate facility" thereby discouraging the number of three-way call attempts. The automated attendant feature ensures that the party called takes an active role in acceptance or rejection of the call as opposed to a call automatically processed by an apathetic live operator.
3. With the loss of monies received from commissions, Oakland County could expend \$476,000 for purchase, installation, maintenance, and training of a new system and incur an additional annual expense of \$120,000 for backroom vendor support operations with no reimbursement by users. Considering this expense, it is questionable if Oakland County could sustain the same levels of technology and service currently provided to inmates and the public.

Based on the aforementioned information, Oakland County firmly opposes the proposed changes in FCC regulations. Should you desire additional information or input, please feel free to contact me at 810-858-0162.

Sincerely,



Richard C. Johnston
Division Manager

RCJ/bl
Attachment
cc: D. Ross
D. Brown
File

works
Oakland County
Department of Public Works
Facilities Maintenance & Operations
Telephone Communications Unit

May 7, 1993

Request for Proposal
Inmate Collect-Only and Pay Phone Service

Section A:
PROPOSAL GUIDELINES AND GENERAL INFORMATION

1. GENERAL INFORMATION

Sealed proposals will be received by the Oakland County Purchasing Division for the establishment of a three or five-year Contract at no cost to the County of Oakland. The Contract will be with a vendor or vendors who will design, furnish, install, operate, and perpetually maintain two separate telephone systems as follows:

- * Collect-only inmate telephone services.
- * Coin-operated telephone services.

These services are located at various County inmate facilities and offices throughout Oakland County. The County reserves the right to award a single Contract or multiple Contracts as determined to be in its best interest. Contracts may be awarded as follows:

COLLECT-ONLY INMATE TELEPHONE SERVICES:

- Commission Module #1: Furnish Collect-Only Telephone Equipment and Intra-IATA Telephone Services.
- Commission Module #2: Furnish Collect-Only Telephone Equipment, Intra-IATA Telephone Services, and Inter-IATA Telephone Services.
- Commission Module #3: Furnish Collect-Only Inter-IATA Telephone Services Only (inter-exchange carrier).

PUBLIC COIN-OPERATED TELEPHONE SERVICES:

- Commission Module #4: Furnish Public Coin-Operated Telephone Equipment and Intra-IATA Telephone Services.
- Commission Module #5: Furnish Public Coin-Operated Telephone Equipment, Intra-IATA Telephone Services, and Inter-IATA Telephone Services.
- Commission Module #6: Furnish Public Coin-Operated Inter-IATA Telephone Services Only (inter-exchange carrier).

All labor, materials, and incidentals provided for these installations will be furnished and installed by the Contractor to the satisfaction of Oakland County and the County Representatives. For assistance with this proposal, please contact County personnel as follows:

Oakland County
Department of Public Works
Facilities Maintenance & Operations
Telephone Communications Unit

May 6, 1993

Note: Provide three copies of this form and any attachments

PROPOSAL FORM

NAME OF BIDDING COMPANY: _____

STREET ADDRESS: _____

CITY: _____ STATE: _____ ZIP CODE: _____

TELEPHONE: _____ CONTACT PERSON: _____

PROPOSAL:

Your signature on this document carries certain responsibilities. By signing you state that you are aware of all the conditions governing the work outlined in the specification documents. You are aware of the requirements of the County, both Purchasing's requirements for submission of your proposal and Telephone Communications' requirements for the content of the proposal. By your signature, you state that you or another representative of your firm has examined all sites required within the specifications and addressed all questions related to the work. By your signature, you propose to furnish all labor, material, equipment, and means of service to perform and complete all work and pay the commission percentage rates(s) specified in this document.

This proposal is due no later than 10:00 a.m., Wednesday, June 16, 1993. This proposal is to be delivered to the Oakland County Purchasing Division, Executive Office Building, at the following address:

Oakland County
Purchasing Division
Executive Office Building
Third Floor
1200 N. Telegraph
Pontiac, MI 48341

COMMISSION RATES:

State the commission rate your firm will pay for the modules you propose to service. Commissions are based on all gross revenue billed calls. Write the word "None" in each commission modules that you do not propose to service.

COLLECT-ONLY INMATE TELEPHONE SERVICES:

Commission Module #1: Furnish Collect-Only Telephone Equipment and Intra-LATA Telephone Services.

Three-Year Contract _____% Five-Year Contract _____%

Commission Module #2: Furnish Collect-Only Telephone Equipment, Intra-LATA Telephone Services, and Inter-LATA Telephone Services.

Three-Year Contract _____% Five-Year Contract _____%

Commission Module #3: Furnish Collect-Only Inter-LATA Telephone Services Only (inter-exchange carrier).

Three-Year Contract _____% Five-Year Contract _____%

PUBLIC COIN-OPERATED TELEPHONE SERVICES:

Commission Module #4: Furnish Public Coin-Operated Telephone Equipment and Intra-LATA Telephone Services.

Three-Year Contract _____% Five-Year Contract _____%

Commission Module #5: Furnish Public Coin-Operated Telephone Equipment, Intra-LATA Telephone Services, and Inter-LATA Telephone Services.

Three-Year Contract _____% Five-Year Contract _____%

Commission Module #6: Furnish Public Coin-Operated Telephone Services Only (inter-exchange carrier).

Three-Year Contract _____% Five-Year Contract _____%

VERIFICATIONS:

- _____Initial I understand that these commission rates are binding until this Contractor's proposal is accepted and a Contract is written.
- _____Initial I certify that the commission rates quoted are based on "gross revenues billed" and contain all Contractor costs such that there are no external costs to the County.
- _____Initial I understand that the County may elect to award the work under this work to more than one Contractor by commission module.
- _____Initial This Contractor's employees and the employees of this Contractor's Sub-Contractors will supply the County with all necessary information to obtain security clearance by the Sheriff's Department.
- _____Initial This Contractor certifies and agrees to fully comply with all aspects of the maintenance, trouble tickets, and repair procedures called out in the proposal specifications.
- _____Initial I have attached full information on the capabilities of the system this Contractor is proposing. I have answered all questions and issues raised in the specifications and attached my documentation to the back of this proposal form.

SIGNATURE OF BIDDER:

This proposal is submitted in the name of:

COMPANY _____

BY _____

TITLE _____

DATE _____

Note: Attach your executive summary and all other information and documentation required by the specifications to the back of this proposal form.

Section D:
RATES AND COMMISSIONS

1. SURCHARGES AND TELECOMMUNICATION RATES

All rate policies are subject to changes initiated by the Federal Communications Commission and/or the Michigan Public Service Commission. This Contractor, as a supplier of regulated or unregulated services, will ensure that all telecommunication rates charged will be equal to the rate/mileage schedules and surcharges charged by time of day and day of week, including special holiday rates, by the prevailing dominant regulated telecommunication providers of intra-LATA and inter-LATA telecommunication services during the Contract period. For the purposes of this proposal, the prevailing dominant intra-LATA telecommunications provider is Michigan Bell Telephone Company (Ameritech), and the prevailing dominant inter-LATA telecommunications provider is American Telephone and Telegraph (AT&T).

This Contractor will attach copies of all current applicable AT&T's and Michigan Bell's tariffs detailing all charges, rates, and mileage bands as part of this RFP. Failure to supply this information may be cause for rejection of your proposal.

This Contractor will submit written notification to the County Representative within sixty (60) days of any change in prevailing dominant regulated telecommunication providers and/or approved rate changes pursuant to an application and resulting in a Michigan Public Services Commission or Federal Communications Commission Order. Contractor's failure to furnish this written notification and accordingly adjust commission payments to the County retroactive to the effective date of the Order may be just cause for cancellation of this Contract. Written notification will include a copy of the tariff(s) detailing all charges and rates.

2. GROSS REVENUES BILLED HISTORIES - 1992

The following is an itemization of "gross revenues billed" by our present providers of service by type of service for 1992 to be used by this Contractor as a guideline in determining future potential gross revenues billed. Oakland County does not guarantee the accuracy of dollar amounts or quantities as provided by the County's present providers of service indicated below: